

March 14, 2022

BY ECF

Judge Ronnie Abrams
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Dodd v. Advance Magazine Publishers, Inc. d/b/a Condé Nast (21-cv-8899):
Request for Extension of Time to Respond to Amended Complaint

Dear Judge Abrams:

The undersigned represents Defendant Advance Magazine Publishers, Inc. d/b/a Condé Nast (“Condé Nast”). With the consent of Plaintiffs, we are writing to request an extension of time for Condé Nast to answer, move, or otherwise plead to the Amended Complaint to and including April 8, 2022.

Condé Nast moved to dismiss the Complaint with prejudice on January 31, 2022 [ECF No. 15]. In lieu of responding to the Motion to Dismiss, Plaintiffs filed an Amended Complaint naming eight additional representative plaintiffs and asserting claims under seven additional states’ and territories’ right of publicity laws [ECF No. 19].

The current deadline for Condé Nast to respond to the Amended Complaint is March 15, 2022. [ECF No. 18]. Condé Nast requests this extension to allow it and its counsel adequate time to investigate the seven additional states’ and territories’ right of publicity laws under Plaintiffs’ novel theory asserted against Condé Nast in the Amended Complaint and to investigate the eight additional named Plaintiffs. No other requests for extensions have been made to respond to the Amended Complaint.

Counsel for Plaintiffs consents to the requested extension.

Thank you for your consideration.

Respectfully,
/s/ Kristen Rodriguez
Counsel for Defendant, Condé Nast
(*Pro Hac Vice*)

cc: Phil Fraietta, Counsel for Plaintiffs (via ECF)
Natalie Spears
Sandy Hauser

Application granted. Defendant shall answer, move, or otherwise respond to the Amended Complaint by April 8, 2022. Given Defendant's anticipated response to the Amended Complaint, the motion to dismiss the original complaint is denied as moot. The Clerk of Court is respectfully directed to terminate the motion at docket number 15.

SO ORDERED.



Hon. Ronnie Abrams
March 15, 2022